

A Federally mandated HDTV copy protection system would be harmful to consumers, and ultimately to the entire Digital Television industry.

1. Added costs to consumers would be high, with no added benefit, and there is no evidence the proposed system would protect content providers in the long term.
2. There is little or no evidence that HDTV piracy is an issue. The amount of storage space and bandwidth required to record and transmit these broadcasts is prohibitive to the vast majority of consumers.
3. Early adopters who already have HDTV equipment would be faced with expensive upgrades in order to use the technology that they have already paid for. These early adopters are critical to the success of HDTV as a format, and if they are alienated by regulations it would be harmful to the continued success of the technology.
4. This proposal relies on DMCA and the Copyright Act and would have a wide effect on personal computing devices, all of which lie outside of the FCC's jurisdiction.
5. The betamax case firmly established consumer's rights to record broadcasts for time-shifting and format-shifting purposes. How will these rights be protected under the proposed copy protection system?